

11-12-04
CMB
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
NOV 10 2004

CIVIL ACTION NO.:

04-12317 WGY

AMERICAN TOWER CORPORATION,
Plaintiff,

v.

J.L.B. CONSTRUCTION, INC., 21ST
CAPITAL CORPORATION, PRIME
COMMUNICATIONS, LLC, AMF
ELECTRICAL CONTRACTORS, INC.,
HEINZ CORPORATION, DANIEL
WENESS CONSTRUCTION,
WESTERN STATES TOWER, LLC,
WEST CENTRAL CONSULTING
SERVICES, INC., STEWART
ELECTRIC, INC., GLOBAL TOWER
SERVICE, ADVANCED LIGHTNING
TECHNOLOGY, INC. and GULF
COAST STEEPLEJACK,
Defendants.

MOTION FOR CHANGE OF VENUE

NOW COMES the Defendant, JLB Construction Inc. to make request to the court
To make the request that the proceeding of this case be expedited to a location where the
Majority interests are being considered. JLB Construction Inc., Prime Communications,
AMF Electric, Heinz Corporation, Daniel Weness Construction, Western States Towers,
West Central Consulting Services, Stewart Electric, Global Tower Services, Advanced
Lightning Technology and Gulf Coast Steeple Jack are among this claim and all maintain
and conduct their business in the Central Region of the United States. The Plaintiff,

American Tower Corporation or owned or leased by a third-party customer of the Plaintiff.

PARTIES

1. The Plaintiff American Tower Corporation (the "Plaintiff" or "American Tower") is a corporation incorporated under the laws of the State of Delaware having its principal place of business at 116 Huntington Avenue, Boston, Massachusetts 02116.
2. The Defendant J.L.B. Construction, Inc. ("JLB" or the "Contractor") is a corporation incorporated under the laws of the State of Iowa having its principal place of business at 1030 Donna Street, Denver, Iowa 50622, with a former address of 241 West Franklin Street, Denver, Iowa 50622.
3. The Defendant 21st Capital Corporation ("Capital") is a corporation incorporated under the laws of the State of California having its principal place of business at 23852 Pacific Coast Highway, #600, Malibu, California 90265.
4. The Defendant Prime Communications, LLC ("Prime") is a corporation incorporated under the laws of the State of Missouri having its principal place of business located at 6716 Graden Road, Parkville, Missouri 64152.
5. The Defendant AMF Electrical Contractors, Inc. ("AMF") is a corporation incorporated under the laws of the State of Missouri having its principal place of business located at 1627 Sublette Avenue, St. Louis, Missouri 63110.
6. The Defendant Heinz Corporation ("Heinz") is a corporation incorporated under the laws of the State of Missouri having its principal place of business located at 804 Lebanon Drive, St. Louis, Missouri 63104.

7. The Defendant Daniel Weness Construction ("Weness") is a corporation incorporated under the laws of the State of Minnesota having its principal place of business located at 11384 790th Avenue, LeRoy, Minnesota 55951.

8. The Defendant Western States Tower, LLC ("WST") is a corporation incorporated under the laws of the State of Nevada having its principal place of business located at 1475 Terminal Way #A-5, Reno, Nevada 89502.

9. The Defendant West Central Consulting Services, Inc. ("WCCS") is a corporation incorporated under the laws of Texas having its principal place of business at 23302 Margerstadt, Hockley, Texas 77447.

10. The Defendant Global Tower Service ("Global") is a corporation incorporated under the laws of the State of Illinois having its principal place of business located at 810 34th Avenue, Moline, Illinois 61265.

11. The Defendant Advanced Lightning Technology, Ltd. ("Advanced") is a corporation incorporated under the laws of the State of Texas having its principal place of business located at 122 Leesley Lane, Argyle, Texas 76226.

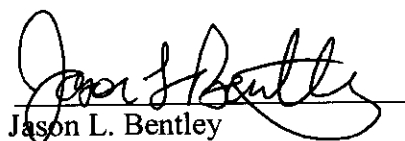
12. The Defendant Gulf Coast Steeplejack ("Gulf Coast") is a corporation incorporated under the laws of the State of Texas having its principal place of business located at 1994 FM 356 N, Onalaska, Texas 77360.

JURISDICTION

13. The United States District Court for the District of Massachusetts has proper jurisdiction over this matter by reason of complete diversity of citizenship of the party corporations and the jurisdictional amount in controversy. 28

American Tower Corporation maintains interests throughout the United States and having multiple office locations. JLB Construction Inc., makes this motion with the interests of majority being from the Central Region.

Respectfully Submitted,
JLB CONSTRUCTION INC,
By its President,

A handwritten signature in black ink, appearing to read "Jason L. Bentley", is written over a horizontal line.

Jason L. Bentley
President
JLB Construction Inc.
1030 Donna Street
Denver, IA 50622
319-984-6144